

FILED

MAY 05 2015

IN THE UNITED STATES DISTRICT COURT Phil Lombardi, Clerk
FOR THE NORTHERN DISTRICT OF OKLAHOMA U.S. DISTRICT COURT

UNITED STATES OF AMERICA,**Plaintiff,****v.****DERICK DEAN BROWN,****Defendant.**Case No. **15 CR 095 CVE****INDICTMENT**

**[COUNT 1: 18 U.S.C. §§ 2251(a) and
2251(e) – Sexual Exploitation of a
Child;**

**COUNT 2: 18 U.S.C. §§ 2252(a)(2) and
2252(b)(1) – Receipt of Child
Pornography;**

**COUNTS 3 & 4: 18 U.S.C. § 2422(b) –
Enticement; Forfeiture Allegation: 18
U.S.C. § 2428 – Enticement Forfeiture;**

**COUNT 5: 18 U.S.C. §§ 2252(a)(4)(B)
and 2252(b)(2) – Possession of Child
Pornography]**

THE GRAND JURY CHARGES:**COUNT ONE****[18 U.S.C. §§ 2251(a) and 2251(e)]**

On or about March 8, 2015, in the Northern District of Oklahoma and elsewhere, the defendant, **DERICK DEAN BROWN**, did knowingly employ, use, persuade, induce, entice, and coerce, and attempt to do so, a minor to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT TWO
[18 U.S.C. §§ 2252(a)(2) and 2252(b)(1)]

On or about March 8, 2015, in the Northern District of Oklahoma and elsewhere the defendant, **DERICK DEAN BROWN**, knowingly received and attempted to receive visual depictions of a minor engaging in sexually explicit conduct using any means and facilities of interstate and foreign commerce and which visual depictions had been mailed, shipped, and transported in and affecting interstate and foreign commerce. These depictions contained materials which had been so mailed and shipped and transported by any means, including by computer. The production of such depictions involved the use of minors engaging in sexually explicit conduct and the visual depictions were of such conduct.

All in violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT THREE
[18 U.S.C. § 2422(b)]

Between on or about January 28, 2015, and on or about March 4, 2015, in the Northern District of Oklahoma, the defendant, **DERICK DEAN BROWN**, used a facility and means of interstate and foreign commerce, namely the internet and a cell phone, to knowingly persuade, induce, entice, and coerce an individual who has not attained the age of eighteen years to engage in any sexual activity for which he can be charged with a criminal offense.

All in violation of Title 18, United States Code, Section 2422(b).

COUNT FOUR
[18 U.S.C. § 2422(b)]

From on or about March 30, 2015, to on or about April 1, 2015, in the Northern District of Oklahoma, the defendant, **DERICK DEAN BROWN**, used a facility and means of interstate and foreign commerce, namely the internet and a cellphone, to knowingly attempt to persuade, induce, entice, and coerce an individual whom he believed had not attained the age of eighteen (18) years, to engage in any sexual activity for which he can be charged with a criminal offense.

All in violation of Title 18, United States Code, Section 2422(b).

FORFEITURE ALLEGATION
[18 U.S.C. § 2428]

The allegations contained in Counts Three and Four of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2428.

Upon conviction of the enticement offenses alleged in Counts Three and Four of this Indictment, as part of his sentence, the defendant, **DERICK DEAN BROWN**, shall forfeit to the United States any property, real or personal, which was used or intended to be used to commit or to facilitate the commission of such offenses, including, but not limited to:

VEHICLE

One 2008 Ford Mustang, VIN 1ZVHT80N985140032.

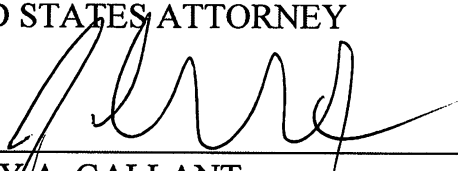
All pursuant to Title 18, United States Code, Section 2428.

COUNT FIVE
[18 U.S.C. §§ 2252(a)(4)(B) and 2252(b)(2)]

On or about April 1, 2015, in the Northern District of Oklahoma, the defendant, **DERICK DEAN BROWN**, knowingly possessed, and attempted to possess, and knowingly accessed with intent to view, visual depictions of minors engaging in sexually explicit conduct in one or more graphic image files and video files. The production of the visual depictions involved the use of at least one prepubescent minor and a minor who had not attained 12 years of age engaging in sexually explicit conduct. The visual depictions had been mailed, and had been shipped and transported in and affecting interstate and foreign commerce, and had been shipped and transported using means and facilities of interstate and foreign commerce, and were produced using materials which had been so mailed and shipped and transported by any means including by computer.

All in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

DANNY C. WILLIAMS, SR.
UNITED STATES ATTORNEY



JEFFREY A. GALLANT
Assistant United States Attorney

A TRUE BILL

/s/Grand Jury Foreperson

Grand Jury Foreperson